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VIA ECF

Hon. Valerie E. Caproni
United States District Judge
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: United States v. Anthony Wroten 21 Cr. 603 (VEC)

Dear Judge Caproni:

On October 28, 2021, the Court modified Mr. Wroten's bond conditions to allow him to travel to China to play professional basketball, after meeting certain conditions. Mr. Wroten has met those conditions. Unfortunately, the team Mr. Wroten was supposed to play for in China wanted to reduce his salary due to fans, a large source of revenue for the league, not being allowed into arenas because of the emergence of the Covid-19 omicron variant. Mr. Wroten therefore never traveled to China and has since been looking for new teams to play for. Today Mr. Wroten received a contract to play for a professional basketball club called Gymnastikos Syllogos Iraklis, a member of the Hellenic Basketball League, in Thessaloniki, Greece.

I am writing to request that Mr. Wroten's bond conditions be modified to allow him to travel from Seattle, Washington, to Thessaloniki, Greece, including all points in between.

I have spoken with the government, and although they remain opposed to Mr. Wroten's international travel, they recognize that the Court's prior ruling allowed Mr. Wroten to travel to China to play professional basketball. The government therefore does not oppose this requested bail modification.

Respectfully Submitted,


Christine Delince, Esq.

cc: AUSA Finkel
AUSA Greenberg